

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
ROCK HILL DIVISION

WESTROCK SERVICES, INC., )  
Plaintiff, ) Civil Action No. 0:18-CV-00781-MGL  
v. )  
TONYA HUFFMAN, )  
Defendant. )  
\_\_\_\_\_  
CONSENT MOTION FOR  
EXTENSION OF TIME TO ANSWER  
OR RESPOND

Defendant Tonya Huffman, with the consent of Plaintiff, moves for an extension through May 27, 2018, to answer, move, or otherwise plead in response to the Complaint in this action. Good cause exists to extend the time for Defendant to answer for several reasons. First, this is a complex matter which involves claims arising under both South Carolina and federal law relating to the protection of trade secrets, the rights and duties of employees, and the existence and extent of the fiduciary duties of an employee. Therefore, an extension is necessary for Defendant to appropriately discover the necessary facts and determine any issues of law which are necessary to fully respond to the Complaint. Second, Defendant has fully cooperated throughout this matter to expeditiously resolve this matter, as evidenced by her joint filing of two consent motions to extend the Court's March 29, 2018 Temporary Restraining Order. Third, Plaintiff will not be prejudiced by this extension, as evidenced by its consent to this motion. Lastly, an extension of time will not unnecessarily delay this matter, as Defendant's request is for a limited time and will not require the Court to alter any other deadlines.

**[SIGNATURE ON FOLLOWING PAGE]**

MCANGUS GOODELOCK & COURIE, L.L.C.

*s/Elizabeth M. McMillan*

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ATTORNEYS FOR DEFENDANT,  
TONYA HUFFMAN

April 27, 2018